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CHILDREN'S HEALTH DEFENSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE,

Plaintiff,

v.

FACEBOOK, INC., ET AL.,

Defendants.

Case No. 3:20-cv-05787-SI

CIVIL LOCAL RULE 6-2(A)
STIPULATION

Pursuant to Civil Local Rule 6-2(a), Defendants Facebook, Inc., Mark Zuckerberg, The Poynter Institute for Media Studies, Inc., and PolitiFact (“Defendants”) and Plaintiff Children’s Health Defense (“Plaintiff”), by and through their respective counsel, have consented to the following enlargement of time to file Plaintiff’s Opposition to any Rule 12 motion or other response to the Complaint:

1. Plaintiff’s Opposition to any Rule 12 motions or other responses filed by Defendants shall be due December 21, 2020.
2. Defendants’ Replies to Plaintiff’s Opposition shall be due January 21, 2021.

Plaintiff filed the Complaint on August 17, 2020. (Dkt. 1). Plaintiff served the Complaint on Defendant Facebook, Inc. on August 19, 2020 (Dkt. 16), and attempted service on Defendants The Poynter Institute for Media Studies, Inc., and PolitiFact on August 19, 2020 and August 27, 2020, respectively. A summons issued to Defendant Mark Zuckerberg on August 19, 2020. (Dkt. 7). Defendants’ deadline to respond to the Complaint has been enlarged once by currently-filed stipulation to October 23, 2020.¹

Good cause exists, and the parties’ stipulated request for an enlargement of time is reasonable in light of the complicated subject matter of this case, the number of issues in dispute, and the need to coordinate among multiple, separately represented defendants. The Complaint includes four counts invoking complex issues of constitutional and statutory law. Moreover, the Thanksgiving holiday falls within the time allotted for Plaintiff to prepare its Opposition, as do the currently-scheduled case management conference and related filings, and the winter holidays fall within the time allotted for Defendants to prepare their replies. This stipulated request is supported by the accompanying Declaration of Sonal N. Mehta.

Pursuant to Civil Local Rule 6-2(a), Plaintiff and Defendants hereby request that the Court enter an order allowing the enlargement of time set forth above.

¹ Defendants reserve their rights to raise any jurisdictional, service-related, or venue-related challenges in response to the Complaint, and this Stipulation does not waive any such rights.

1
2 Dated: September 9, 2020

WILMER CUTLER PICKERING, HALE AND
DORR LLP

3 By: /s/ Sonal N. Mehta
4 SONAL N. MEHTA

5 *Attorney for Defendants*
Facebook, Inc. and Mark Zuckerberg

6
7 Dated: September 9, 2020

JASSY VICK CAROLAN LLP

8 By: /s/ Kevin L. Vick
9 KEVIN L. VICK

10 *Attorney for Defendants*
The Poynter Institute for Media Studies, Inc. and
11 PolitiFact

12
13 Dated: September 9, 2020

By: /s/ Roger I. Teich
14 ROGER I. TEICH

15 *Attorney for Plaintiff*
Children's Health Defense

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation To Enlarge Time. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatures have concurred in this filing.

Dated: September 9, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: September 9, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta